

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE**

AMERICAN ALLIANCE FOR EQUAL RIGHTS,
Plaintiff,

v.

McDONALD'S CORPORATION;
McDONALD'S USA, LLC; and
INTERNATIONAL SCHOLARSHIP & TUITION
SERVICES, INC.,
Defendants.

No. 3:25-cv-50

STIPULATION OF DISMISSAL

Per Rule 41(a)(1)(A)(ii), the parties stipulate to the following:

1. McDonald's created, and ISTS administers, the HACER scholarship program. *See Write the Next Chapter of Your Story with the McDonald's HACER National Scholarship*, perma.cc/G3QX-HUW6; *Scholarship Management Services*, perma.cc/5X6J-8YDM.
2. Plaintiff, the American Alliance for Equal Rights, filed this suit on January 12, 2025, alleging that HACER violates 42 U.S.C. §1981.
3. When the Alliance sued, HACER's "Eligibility & Requirements" page stated that applicants must "have at least one parent of Hispanic/Latino heritage." *Eligibility & Requirements*, perma.cc/429P-45CW. The HACER application reiterated that applicants "must be from a family that came from" one of 22 Hispanic/Latino countries. Doc.6-3 at 5. The application required applicants to answer, "Are you of Hispanic/Latino heritage". Doc.6-3 at 5. The application also made applicants reveal, as a "required (*)" field, their "Country of Family Origin," explaining that "applicants must

be from a family that came from at least one of the countries in the drop down.” Doc.6-3 at 13.

4. Defendants will revise the HACER scholarship program as follows:

a) The application deadline for the current round of the program will be extended until at least March 6, 2025.

b) The program will not have any eligibility requirement or preference based on applicants’ race or ethnicity.

5. This case is hereby dismissed with prejudice. Both sides will pay their own fees and costs.

Respectfully submitted,

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**pro hac vice* application forthcoming

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